

MDB.SUP.PL.001-R02

PROCUREMENT AND SUPPLIES POLICY

M. DIAS BRANCO S/A INDÚSTRIA E COMÉRCIO DE ALIMENTOS

OCTOBER 09, 2020

PREPARED BY:

Supply Board

REVISED BY:

Legal Board

Board of Directors

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PROCUREMENT AND SUPPLIES POLICY - M. DIAS BRANCO S/A INDÚSTRIA E COMÉRCIO DE ALIMENTOS

1. **DEFINITIONS**

1.1 The terms and expressions listed below, when used in this Policy, in the singular or plural, will have the following meaning:

"Government Authority" – Any body, department or entity of the direct or indirect administration of any of the powers of the Union, States, Federal District or Municipalities; legal entity incorporated into public assets or entity for whose creation or funding the treasury has concurred or concurs with more than fifty percent of the assets or annual revenue (or over which the State or Government may, directly or indirectly, exercise a dominant influence by holding a majority of the subscribed capital, controlling a majority of votes or having the right to appoint a majority of members of management, governing body or supervisory board). Bodies, state entities or diplomatic representations of a foreign country, as well as bodies, entities and persons controlled, directly or indirectly, by the public authorities of a foreign country, international bodies or public organizations. The latter case includes sovereign wealth funds or an entity owned by a sovereign wealth fund.

"<u>Internal costumer</u>" – Any and all areas and/or Employees of the Company who request/need to purchase a product or service.

"<u>Employees</u>" – All employees, Directors (statutory or not), members of the Board of Directors, committee members (statutory or not), members of the Fiscal Council, apprentices and interns of the Company, regardless of their position or function.

"Company" or "M. DIAS BRANCO" – M. Dias Branco S/A Indústria e Comércio de Alimentos and its subsidiaries.

"<u>Purchases with Contract</u>" – All purchases that require the elaboration of a Contract that guarantees all the terms and conditions of the purchase.

"Purchases without Contract" – All purchases that do not require the elaboration of a Contract.

"Contract" – Legal instrument that ensures all the elements agreed upon in an acquisition, which may be drawn up by the supplier or by the Company, provided that it is mandatorily revised by the Legal Department of M. DIAS BRANCO.

"EBS" – E-Business Suite: system used by the Company to process purchases of goods or services.

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- "<u>Supplier</u>" External provider of materials or services that the Company needs to carry out its processes, products and/or services.
- "<u>Approved Supplier</u>" Supplier that went through the entire selection process and was approved to be registered in the system.
- "<u>Registered Supplier</u>" Supplier already mapped and with all its information registered in the Company's system, and who can participate in purchasing processes that do not involve QSMA Critical Items.
- "Critical Supplier" Provider of any critical item.
- "Qualified Supplier" Supplier Registered and approved in the Company's qualification process, being able to be classified as 'Qualified with Restriction', 'Qualified' and 'Qualified with Excellence', and who can participate in the purchase processes for Critical QSMA Items.
- "<u>Supply Development</u>" Management of the Procurement Department responsible for governance, processes, projects, systems, indicators and people, as well as for carrying out operational support activities for purchasing managers.
- "Raw Material Management" Management of the Supply Board responsible for the purchase of inputs used in the manufacture of products, with the exception of wheat.
- "Packaging Management" Management of the Supply Board responsible for the purchase of all packaging materials used in the manufacture of products, including inputs for the manufacture of packaging within M. Dias Branco.
- "Industry and Energy Management" Management of the Supply Board responsible for the purchase of MRO, services directly related to Industry and CAPEX and energy.
- "<u>Logistics Management</u>" Management of the Supply Board responsible for the purchase of all materials and services directly related to the logistics processes.
- "Administrative and Commercial Management" Management of the Supply Board responsible for the purchase of all materials and services directly related to the processes of the Company's administrative areas and also to the commercial and marketing areas.
- "<u>OSMA Critical Item</u>" Item (material or service) that has an impact on the activities of OSMA.
- "Direct Materials" Materials that are part of the composition (e.g., raw materials and primary

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packaging). These are categorized as "Packaging" and "Raw Materials" in the supply activities and work processes.

"Indirect Materials" – Materials used indirectly in production or necessary for carrying out activities, which are not part of the product's composition. These are foreseen in the categories called "Administrative & Commercial", "Industry and Energy" and "Logistics" within the activities and work processes of supplies.

"Purchase Order" – Systemic instrument issued by the buyer for the acquisition of materials and services, which can be classified as "direct" or "agreement".

"<u>OTRS</u>" – Open Ticket Request System: management system for demands and services provided by the Company's internal areas.

"<u>Purchasing Portal</u>" – System used by the Company to communicate with Suppliers in the purchasing process.

"OSMA" - Quality, Food Safety, Occupational Safety and Environment...

"<u>Purchase Requisition</u>" - Systemic instrument issued by the Requester that initiates the acquisition process.

"Requester" - Internal Customer who has access to issue a Purchase Requisition...

"<u>Terms and conditions</u>" – Basic guidelines document defined by the Company for relations with Suppliers.

2. PURPOSE AND SCOPE

- 2.1. This Purchasing Policy of M. Dias Branco S/A Indústria e Comércio de Alimentos ("<u>Policy</u>") is intended to (i) establish guidelines to guide the activities of the Supply Area and its relationship with Internal Customers and Suppliers, ensuring the preservation corporate integrity, resource management and meeting the Company's needs; and (ii) ensure objectivity and transparency through well-defined processes and excellent execution of activities for purchasing/contracting materials and services, generating value for the Company.
- 2.2. The rules established in this Policy apply to the Company and its subsidiaries, as well as to all its Employees.

3. REFERENCES

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- 3.1. This Policy was prepared in accordance with the following standards and documents:
 - (i) Law No. 12,846, of August 1, 2013 ("Anti-Corruption Law");
 - (ii) Decree No. 8,420, of March 8, 2015;
 - (iii) Policy for Transactions with Related Parties and Other Situations involving Conflict of Interests;
 - (iv) Anti-Corruption Policy;
 - (v) Sustainability Policy;
 - (vi) Company Code of Ethics;
 - (vii) MDB.SUP.FL.002 Supplier Registration;
 - (viii) MDB.SUP.PO.001 Supplier Registration;
 - (ix) MDB.SUP.PO.005 Standard Purchase Order;
 - (x) MDB.SUP.PO.007 Financial Evaluation of Packaging and Raw Material Suppliers;
 - (xi) MDB.SUP.PO.009 Management of Contracts and Commercial Agreements for Indirect Materials;
 - (xii) MDB.SGI.PO.008 Supplier Qualification Management;
 - (xiii) MDB.CAP.PL.001 Hierarchy and Levels of Approval for Purchases and Payments;
 - (xiv) MDB.RFS.PO.001 Item Registration;
 - (xv) Oracle Manual EBS Purchasing Requestor;
 - (xvi) MDB.SUP.MS.003 Standard Purchase Order;
 - (xvii) MDB.SUP.PO.004 Direct Purchase Order;
 - (xviii) MDB.SUP.PO.002 Agreement and Contract;
 - (xix) MDB.SUP.PO.003 Alteration and/or Cancellation of Purchase Order;
 - (xx) Oracle Manual EBS Approval Workflow; and
 - (xxi) Purchasing Portal Manual
 - (xxii) MDB.SUP.PO.013 Procedure for preparing, approving and controlling Contracts;
 - (xxiii) Resolution of the Board of Directors CAD/MDB No. 001/2013 and subsequent amendments:
 - (xxiv) MDB.CAP.PL.009 Cash Advance Policy;
 - (xxv) MDB.SUP.PO.012 Selection and approval of suppliers.
 - (xxvi) NP.ALM0040-R00 Receipt Tolerance.

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4. GENERAL GUIDELINES

- 4.1. M. DIAS BRANCO seeks to optimize the supply chain, aiming at the continuous improvement necessary for the development of the organization's businesses and permanent technical improvement of the process of acquiring goods and services. Maintaining the legal and socio-environmental conditions associated with economic and financial conditions, with the objective of ensuring sustainable processes and preserving corporate integrity, the Company establishes the following guidelines for its purchasing processes:
 - (i) Ensure ethics and transparency in its decision-making processes, always in line with the Company's Anti-Corruption Policy and Code of Ethics;
 - (ii) Comply with the terms and conditions agreed in the Contracts and/or purchase orders;
 - (iii) Stimulate competition in an environment of equality among Suppliers, through a qualification process and technical, organizational and socio-environmental requirements;
 - (iv) Ensure that acquisitions are carried out with previously qualified Suppliers, as required by the Company. However, the qualification of a Supplier does not imply its obligation to participate in the supply process;
 - (v) Use monitoring data from critical Suppliers, having clear and objective information about their performances, behaviors and practices, including sustainability aspects, in order to subsidize purchasing activities, as well as promoting feedback to these Suppliers;
 - (vi) Promoting the fight against child, forced or compulsory labor practices, discrimination in all its forms, moral and sexual harassment, as well as the appreciation of diversity and respect for free union association and the right to collective bargaining together with Suppliers;
 - (vii) Promote the communication of the Company's guidelines to Suppliers;
 - (viii) Work to reduce the cost of acquiring materials and services, maintaining their quality and reliability;
 - (ix) Appropriately allocate resources and provide internal and external training in order to provide access to new technologies and enable the constant improvement of Employees; and
 - (x) Align purchasing practices with the Company's Sustainability Policy, disseminating the commitments assumed in the Sustainable Development Goals, UN Global Compact and Animal Welfare, while the Company is a signatory, and boosting efforts to adopt sustainable practices among its Suppliers, towards the sustainable development of the supply chain.
- 4.2. In order to enable compliance with the guidelines mentioned above, the Company determines that:

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- (i) Negotiations with Suppliers must be conducted exclusively by the Supply Area in order to guarantee: (a) the application of purchasing strategies by category; (b) better commercial conditions in competition processes; (c) the application of good procurement practices; (d) compliance with the rules set forth in this Policy; (e) clarity in cases of exception to any guideline set forth in this Policy; and
- (ii) It is forbidden to pay a Supplier without the proper Purchase Order or approved shipping program to formalize such payment and/or without a signed contract or related instrument, except for tax payments, judicial/administrative indemnities (including succumbence sums), sponsorships linked to the sales area (contracts for the sale of finished products), fines, and water, energy and gas concessionaires.

5. PROCUREMENT PROCESS

A) <u>Procurement Requisition</u>

- 5.1. The Procurement Requisition is the beginning of the systemic purchasing process.
- 5.2. Once approved, the Procurement Requisition will be automatically forwarded to the Supply Area, which will proceed with the acquisition process if the Procurement Requisition is correct and with all the appropriate data. If the Procurement Requisition is in disagreement for the continuity of the acquisition process, the buyer will return the process to the requester, via the system, requesting the necessary adjustments and the resubmission of the correct Procurement Requisition.
- 5.3. In the case of Procurements of maintenance and general material, specifically, including items for projects, the target deadlines and quantities of quotations, under the responsibility of the Supply Area, are described in the procedure "MDB.SUP.PO.005 Standard Procurement Order". In this procedure, the deadline for finalizing the acquisition process for some specific categories is also described. Said period is calculated by subtracting the date of approval of the Procurement Order by the Procurement Area from the date of approval of the requisition, or the date of release of equity for fixed assets. If there is no Qualified and/or Registered Supplier for the item, this deadline is disregarded and the buyer must indicate it in the Procurement Order.
- 5.4. For all categories, before making the Procurement Requisition, the requester must check if there is already a Supplier registered in the system. In addition, for critical QSMA items, whether material or service, it is necessary to verify if there is a Qualified Supplier. If not, the requisition must be prepared only after qualification and/or registration of the Supplier.

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5.5. In the acquisition of services, it is the responsibility of the requester to define the scope for better prospecting of Suppliers by the Supply Area. Scope detailing is extremely important for the development of the service acquisition process.

B) Procurement Strategy

- 5.6. The purchasing strategy can be based on an analysis of the supplier market and possible opportunities, or on a direct request from the requester, in order to meet the security of supply, quality standards, cost, time and quantity required by the Company. The elaboration of the strategy is the responsibility of each buyer and must be aligned with the coordination and/or management of the respective area.
- 5.7. For certain categories, the strategy must be carried out together with the Business Areas and "stakeholders" for technical and supply assurance.

C) Selection of Suppliers

- 5.8. The search for new Suppliers may be carried out by any Internal Customer or by the Supply Area. For non-critical QSMA items, after analysis and approval of the documentation, as well as technical validation by the internal customer, the Supplier will be approved for registration. In the case of a QSMA Critical Item, the approval of the documentation and adherence to the Code of Ethics allows the supplier to participate in the qualification and/or audit process, so that the audit process must observe, necessarily, the procedure "MDB.SGI. PO.008 Supplier Qualification Management". Notwithstanding the above point, the bidding procedures will only take place after the approval of the Procurement Requisition, by the Business area, in accordance with the Policy "MDB.CAP.PL.001 Hierarchy and Levels of Approval for Procurements and Payments".
- 5.8.1. In the event of a search for Suppliers not yet registered, that is, new Suppliers, by an Internal Client, the latter may inform the potential Supplier's data (e.g., name, CNPJ, location, contact) so that the Supplies area can initiate the request process of the documentation, which is the initial stage of the Supplier Selection process, or he can make the request to the Supplier.
- 5.9. After receiving information from the potential Supplier, the Procurement Area must analyze the documents listed in the procedure "MDB.SUP.PO.012 Selection and Approval of Suppliers" to verify requirements of a financial nature and regularity of operation of the potential Supplier. In its analysis, the Supply Area must verify the minimum mandatory documents from the point of view of validity, dependence on the Supplier and criticality.
- 5.10. The checking of documents referred to in Clause 5.8 above must also take place whenever there is a renewal of a contract with Suppliers.

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- 5.11. In order to be homologated, the selected Suppliers must always adhere to the Company's Code of Ethics, through formalization by email.
- 5.11.1 In the event of (i) costs for adapting the Supplier to the requirements mentioned above or (ii) expenses/expenses for technology systems that may benefit the connection and integration of Suppliers with the Company's practices and conduct guidelines, a fee may be charged apportionment of said costs among Suppliers.
- 5.12. Only Approved Suppliers, that is, approved in the selection process and, for Critical QSMA Items, Qualified Suppliers, will participate in the Procurement process. If the Supplier does not comply with the guidelines set forth in the Company's Code of Ethics, in the qualification, requalification, performance monitoring and documentation processes, Contracts and/or Procurement Orders, it may be disqualified and removed from the Company's supplier base.
- 5.13. Any and all Procurements made with a Supplier that have not passed the selection process mentioned above, must be justified in accordance with one or more of the requirements below, provided that it adheres to the provisions of the Company's Code of Ethics, also requiring approval from the Executive Board of Supplies and the requesting area, according to the Company's rules:
 - (i) Elaboration of a report containing the history of the last Procurements and a strategy spreadsheet, when applicable;
 - (ii) Proof that it is the sole Supplier for the item;
 - (iii) Proof that it is an emergency Procurement.
- 5.14. Any Procurement of a Critical QSMA Item from a non-qualified Supplier requires the form "MDB.SGI.FO.004 Approval under Concession" approved by the boards mentioned in Clause 5.13 above, observing the procedure "MDB.SGI.PO.008 Supplier Qualification Management".

D) Supplier Registration

5.15. The registration of Suppliers must be requested from the Supply Area, observing the procedure "MDB.SUP.FL.002– Supplier Registration" and "MDB.SUP.PO.001 – Supplier Registration".

E) <u>Item Registration</u>

5.16. The registration of items must be requested by the requester, via OTRS, to the Indirect Tax Area, observing the procedure "MDB.RFS.PO.001 – Registration of Items". In this sense, it is always necessary to check the list of registered items in effect before requesting a new registration, as well as confirming with the buyer which would be the correct family group to be allocated the

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new item.

F) Quotation and Negotiation

- 5.17. The buyer must request, for each Supplier, a proposal containing price, payment method, readjustment index, NCM (Common Mercosur Nomenclature), taxes, billing mirror and delivery period, as well as informing the payment conditions and standards of Company service or material. The quantity of quotations for some specific categories is described in the procedure "MDB.SUP.PO.005 Standard Procurement Order".
- 5.17.1. The acquisition of categories that do not observe the quantity of quotations described in the procedure 'MDB.SUP.PO.005 Standard Procurement Order" must be justified in accordance with the requirements below, in the Procurement order, provided that it adheres to the provisions of the Code of Ethics of the Company and the rules of authority of the Company:
 - (i) Elaboration of a report containing the history of the last Procurements and a strategy spreadsheet, when applicable;
 - (ii) Proof that it is the sole Supplier for the item;
 - (iii) E-mail from the technical area or the requester justifying the choice.
- 5.17.2. For the purposes of Clause 5.18, the decline of Suppliers to participate in possible quotation processes will be considered as quotation.
- 5.17.3. All proposals and quotes, including Supplier declines, must be stored electronically, as well as predefined justifications or strategies, which must be available for later consultations by managers and audits.

G) Analysis and Equalization of Proposals

5.18. Buyers must rigorously analyze all proposals received in order to make and highlight the best choice for the Company, considering the commercial and technical aspects, as well as the general parameters below. The equalization of the proposals must be documented and stored electronically, and must be available for later consultations by managers and audits.

Table III – General Parameters of proposals evaluated by Supplies and by the Requester

Commercial Conditions (responsibility of the Procurement Area)	Technical Conditions (responsibility of the requesting area)
Price (present value) of the material/service	Material/service characteristics
Shipping and packaging cost	Quality
Discounts	Technical assistance for assembly and maintenance
Payment and delivery conditions	Guarantees
Agreed delivery time	Quantity and delivery time

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Price adjustment conditions	Supply of spare parts and/or accessories
Availability	Others, as long as justified.

5.18.1. If the acquisition process requires a technical opinion, the requester must stick to the technical analysis, with the buyer being responsible for analyzing the commercial aspects. If the technical opinion prevails over the commercial opinion in choosing the winning proposal for the process, the purchasing manager of the category in question must forward the approval in advance to the Board and/or Vice-Presidency of the requesting area and the entire process must be documented.

H) Approval and Formalization of Procurements

- 5.19. Approval of the Procurement must be made directly in the system, observing the hierarchies and levels of authority described in the procedure "MDB.CAP.PL.001 Hierarchy and Levels of Approval for Procurements and Payments". The monitoring of approvals must be done by the requester through the system. Once the systemic acquisition process is completed, with the approval of the Procurement Order, the Supplier is notified via the Procurement Portal and/or by email.
- 5.19.1. The formalization of Procurements with Contract should only occur when the instrument is duly signed. However, the approval of the Procurement Order allows the billing of the orders. For the category of services, the specific procedures of the Third Party Management Area must be complied with.
- 5.19.2. The price variation tolerance accepted upon receipt of the invoice is described in the procedure "NP.ALM.0040-R00 Receipt Tolerance".
- 5.19.3. Upon receipt of the product or service, the requester is responsible for verifying and monitoring the technical performance of the Supplier, with the exception of stock items, for which the Warehouse Area is responsible.
- 5.19.4. The buyer must check the open orders that still have a balance on a quarterly basis and that are no longer used, and then close them.

I) Contracts

- 5.20. The use of Contracts must comply with the requirements set forth in document "MDB.SUP.PO.013– Procedure for preparing, approving and controlling Contracts".
- 5.20.1. All types of Contracts must be filed electronically in case of need for proof of compliance of the Procurement.
- 5.20.2. The Contracts must also observe any other internal policies and/or guidelines regarding the hiring of third parties to perform services on the Company's premises or outside it (in the latter case, also including

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materials), but not limited to the Policy Anti-corruption of M. DIAS BRANCO.

- 5.20.3. The management of Supplier Contracts is the responsibility of the Supply Area and should preferably be carried out electronically, but not exclusively, and the Legal Department may establish any type of control it deems necessary, in addition to the preparation and/or analysis of Contracts and the archiving of the final signed documents, pursuant to document "MDB.SUP.PO.013— Procedure for the preparation, approval and control of Contracts", with integration with the Business Areas regarding compliance with the contracted material/service.
- 5.20.4. Document "MDB.SUP.PO.013– Procedure for preparing, approving and controlling Contracts" will address the requirement for proof of performance of the Contract by the supplier before making payments.

J) <u>Contract Approval</u>

5.21. The signatures required for any type of Contract must be from persons delegated for this responsibility, by means of a power of attorney and/or relevant corporate documents. M. Dias Branco's internal signatures and approvals must comply with document "MDB.SUP..PO.013–Procedure for preparing, approving and controlling Contracts".

K) <u>Hiring Related Parties</u>

5.22. Participation in the bidding process and the eventual hiring of related parties are subject to the Company's "Policy for Transactions with Related Parties and Other Situations involving Conflict of Interests". The buyer must refer to this document in all cases of contracting related parties and be aware of the necessary approvals.

L) Advance Payment

5.23. Making payments to the Supplier before delivering the product or performing the service, regardless of the type, must observe the approval guidelines of document "MDB.CAP.PL.009 – Cash Advance Policy", under the responsibility of the Vice-President. Financial Presidency. Buyer should refer to this document in all advance cases and be aware of the necessary approvals.

6. EXCEPTIONS TO THE POLICY

6.1. Any and all exceptions to this Policy must be duly justified by the contracting area, and duly approved in writing (by e-mail, letter, meeting minutes or related document) by the Executive Board or Vice-Presidency of the Requesting Area or the Collegiate Board or of the Board of Directors and submitted to the Procurement Area, in accordance with approval levels provided for in Resolution CAD/MDB 0021/2013 and subsequent amendments and in documents "MDB.CAP.PL.001 – Hierarchy and Levels of Approval for Procurements and Payments" and "MDB.SUP.PO.004 – Direct Procurement

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Order".

7. RESPONSIBILITIES

- 7.1. It is incumbent upon the Employees to:
 - Ensure compliance with this Policy;
 - When necessary, call the Legal Department and/or the Procurement Area to consult
 on situations that may involve conflict with these guidelines or the occurrence of risk
 situations described therein.

7.2. It is incumbent upon the Supplies Area to:

- Start the acquisition process in accordance with the established deadlines;
- Develop purchasing strategy;
- Evaluate the Supplier from a financial and commercial point of view before registering and renewing the Contract;
- Select and Approve Supplier;
- Start Supplier qualification with the technical area;
- Request proposals from Suppliers;
- Keep proposals and strategies stored electronically;
- Negotiate with Suppliers;
- Make commercial equalization;
- Register Supplier;
- Issue Procurement Order;
- Provide Contracts and signatures;
- Disqualify Supplier and remove it from the supplier base;
- Check open orders quarterly;
- Manage Contracts;
- Consult official document whenever related parties are contracted and provide approvals;
- Consult official document whenever there is advance payment and provide approvals;
- Approve exceptions to this Policy through the Board of Directors.

7.3. It is incumbent upon the Requesting Area to:

- Inform potential Supplier data for selection by the Supply Area;
- Send details/scope of the product and/or service to be Procurement;
- Inform demand in advance in case of recurring Procurements;
- Request registration, selection and/or qualification of a Supplier;
- Create Procurement Requisition;
- Adjust Procurement Requisition returned by the Supply Area;
- Check if there is already a Supplier registered in the system to Procurement the item;

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- Check if there is a qualified Supplier to Procurement a QSMA Critical Item;
- Check the list of registered items in effect before requesting a new registration;
- Confirm with the buyer the correct family group to be allocated to the new item in case of request for a new item registration;
- Perform technical equalization;
- Check and monitor the technical performance of the Supplier;
- Approve exceptions to this Policy through the Board of Directors.
- 7.4. It is incumbent upon the Accounts Payable Area to:
 - Pay Suppliers only upon due Procurement Order or approved remittance program to
 formalize such payment and proof of performance of the Contract or related
 document, except in the case of tax payments, judicial/administrative indemnities
 (including succumbence sums), sponsorships related to the Sales Area (contracts for
 the sale of finished products), fines, and water, energy and gas concessionaires.
- 7.5. It is incumbent upon the Tax Area to:
 - Register items.
- 7.6. It is incumbent upon the Warehouse Area to:
 - Check and monitor the supplier's technical performance for warehouse items.
- 7.7. It is incumbent upon the Vice-Presidencies to:
 - Approve exceptions to this Policy.
- 7.8. It is incumbent upon the Legal Department to:
 - Define terms and drafts of Contracts;
 - Evaluate and approve Contracts;
 - Electronically file the Contracts;
 - Ensuring the application of the Contracts;
 - Review and forward exceptions to this Policy to the competent body.
- 7.9. It is incumbent upon the Audit, Risk and Compliance Area to:
 - Receive complaints and declarations of conflicts or non-compliance with this Policy, take urgent measures, investigate, monitor, follow up and report action plans to

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interested parties;

- 7.10. It is incumbent upon the Board of Directors to:
 - Approve any changes and revisions to this Policy.
 - Regulate the omissions of this Policy.
 - Process non-compliance with the obligations and rules established in this Policy and resolve on it, as applicable.

8. POLICY VIOLATION

8.1. Failure to comply with this Policy will subject the violator to disciplinary sanctions, in accordance with the Company's internal rules (e.g., the Company's Code of Ethics), without prejudice to the applicable administrative, civil and criminal sanctions, attributable to the competent authorities.

9. TERM AND CHANGES

9.1. This Policy is effective as of January 2, 2021 and any changes or revisions must be submitted to the Board of Directors.

10. FINAL DISPOSITIONS

Validity: from January 2, 2021.

1st version: May 25, 2017.

Responsible for the document:

Stage	Responsible
Preparation	Supply Board
Revision	Legal Board
Approval	Board of Directors

Changes log:

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Version	Modified Item	Reason	Date
00	Original version	N/A	25.08.2017
01	Miscellaneous	Review of guidelines.	29.07.2019
02	Miscellaneous	Document name change; Objective review; Review of responsible managers; Detailed description of the procurement process, including all existing and new related processes; Details of responsibilities;	09.10.2020
		Inclusion of the Supply Board.	

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